

**U. S. DEPARTMENT OF ENERGY
WORK BREAKDOWN STRUCTURE DICTIONARY
PART II - ELEMENT DEFINITION**

1. PROJECT TITLE/PARTICIPANT Environmental Management/Paducah Remediation Services, LLC (PRS)		2. DATE 06/29/07	3. IDENTIFICATION SITE Paducah Project DOE Portsmouth/Paducah Project Office (PPPO)
4. WBS ELEMENT CODE 04.13.99.03		5. WBS ELEMENT TITLE Out-year Project Support Service Center PA-0011	
6. INDEX LINE NO. N/A	7. REVISION NO. AND AUTHORIZATION Rev. 0		8. DATE 06/29/07
9. APPROVED CHANGES N/A			
10. SYSTEM DESIGN DESCRIPTION N/A		11. BUDGET AND REPORTING NUMBER N/A	
12. ELEMENT TASK DESCRIPTION <p>THIS IS A PLANNING LEVEL WBS DICTIONARY</p> <p><u>WBS STRUCTURE</u></p> <p>Listed below is the Level 6 WBS Element; this element does not have sub elements:</p> <ul style="list-style-type: none"> • WBS 04.13.99.03 Out-year Project Support Service Center PA-0011 <p><u>INTRODUCTION</u></p> <p>This scope of work is for the activities that support the statement of work (SOW) in the Contractor's contract, but that cannot be attributed to a single project such as Facilities Disposition or Environmental Monitoring. The costs for these activities are captured in this Work Breakdown Structure (WBS), but are applied across all of the funding sources. They include Contractor's Site Management; Business Administration; Project Integration and Controls; Environment, Safety, Health, Quality, and Training; Environmental Compliance and Regulatory Affairs; and Work Controls, Engineering, and Facilities. This scope will continue for the life of the Contractor's contract.</p> <p><u>LOGIC RELATIONSHIPS</u></p> <p>Interfaces:</p> <p><u>Internal to Contractor</u></p> <ul style="list-style-type: none"> • All Contractor's project managers and staff. • All subcontractors. <p><u>External to the Contractor</u></p> <ul style="list-style-type: none"> • U.S. Department of Energy (DOE) PPPO and support contractors • DOE Headquarters (HQ) or other DOE Sites (if applicable) • U.S. Environmental Protection Agency (EPA) • Commonwealth of Kentucky (KY) • Site tenants including United States Enrichment Corporation (USEC); Uranium Disposition Services, LLC; and Swift & Staley Team (SST) • USEC services in the area of property, information technology, radios, etc. • SST, particularly in the areas of property management, information technology, and security. • Nevada Test Site (NTS): Profiling and disposition of newly generated and classified and fissile low-level waste (LLW), if required or applicable. • EnergySolutions: Profiling, treatment, and disposition of mixed and LLW, if required or applicable. • TSCA Incinerator, if required or applicable. • Commercial treatment, storage, and disposal facility (TSDF): For treatment and disposal of 			

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nonradioactive hazardous waste, if required or applicable.

- Stakeholders
- Citizens Advisory Board (CAB) and supporting contractor Edward Holmes Incorporated (EHI).
- DOE Integrated Safety Management System (ISMS) Verification Team
- Other nonregulatory key interfaces

Time Sequencing With Other Work:

- This scope is for the oversight and support of all other activities within the project and, therefore, will be required for the duration of the contract.

SCOPE DESCRIPTION

Project Management

- Provide project management and integration support of all contract activities, as well as, the Contractor's support for the DOE PPPO. This item includes senior level management and leadership in performance of overall Contractor duties. This includes senior management office facilities, budget and milestone planning and control, presentation design, and guidance and direction to administrative support. Also included are leadership in responding to site emergencies, high performance team building, community outreach and involvement, and other support, such as administrative and project control. The scope also includes business-related travel, facilitation of VIP visits, and special requests as directed by the customer.

Business Administration

Finance and Accounting

- Provide accounting support for multiple contract tasks. Track all invoices paid for materials and subcontracts. Support compiling of all pertinent invoice backup, ensuring compliance with contractual requirements, providing contract closeout schedules, and accounts payable invoices for semimonthly billing to PPPO. Certify that all costs are in compliance with the contract. Provide data from all financial accounting functions and the deliverables as listed in the WBS Dictionary Sheet. Provide payroll service for all employees including Work Force Transition (WFT) exempt and craft labor. Provide financial support to the Contractor's management; point of contact with DOE Financial Management and Planning and Budget organizations; management oversight and support to Business Systems, Program Finance, Controller, and WFT Payroll & Benefits organizations; and oversight for development and implementation of applicable policies/procedures. Process reimbursements, print payroll and accounts payable checks, and issue wire transfers. Prepare bank deposits and record bank drawdown daily. Prepare tax returns, issue W-2s, and support tax audits. Prepare, reconcile, and submit MARS reports to DOE monthly. Provide funds management and control services including support to the BCP process. Develop and implement the cost model and interface with project controls on indirect budget formulation guidance and development. Maintain records on all completed capital assets for the Contractor's activities at Paducah and prepare MARS data submission. Administrative maintenance of the Contractor's financial software and data browser. Maintain cost and commitment ledgers at projects reporting levels, provide financial related reports to management, and maintain the Contractor's corporate books. Ensure integration and communication within Finance, Project Integration and Controls, and Management groups related to all business matters. Track cost and projected spending against available funding to ensure no PBS funding limits are exceeded.

Procurement

- Procure supplies and services. Prepare and administer Work Authorizations with USEC, SST,

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and UDS. Provide management and oversight to direct the procurement activities of embedded buyers within the projects. Develop and maintain procurement procedures. Serve on Claims/ Change Board and review actions for compliance with procurement procedures. Provide procurement-specific training. Provide purchasing and subcontracting direction to all purchasing personnel. Provide for development, design, implementation, monitoring and maintenance of Intranet and Internet Web sites pertaining to procurement activity, systems, and distribution of information. Conduct Strategic Planning activities. Implement and maintain the credit card program. Maintain database of cardholders and interface with financial database. Review credit card purchases for compliance with procurement procedures.

- Coordinate contract funding, administer government property, develop and submit proposals, negotiate terms and conditions of contract documents, ensure contract compliance, and manage major team subcontractors. Provide prime contract administration. Administer and ensure compliance with the contract.

Property Management

- Creation/maintenance of a database of all Contractor accountable, government-owned property. Classification of all newly acquired property including addition to database, marking, and tagging. Coordinate with the Infrastructure Subcontractor, SST, to ensure applicable labels or markings are applied to government property. Review purchase requisitions and identify items that require inclusion in the accountable property database. Provide SST information on the remediation contractor property, as required/requested for inclusion in Paducah Site-wide government accountable property database. Record/report all information required per contract deliverables. Coordinate with SST regarding items for disposition. Review Property for High Risk determination and ensure control of High Risk items in accordance with regulations. Develop and submit the monthly Energy Consumption Plan, per DOE Order 430.1B, to SST. Track vehicle information including these: custodian, location, fuel usage, fuel cost, mileage, maintenance schedule, maintenance cost, etc. Report vehicle information to SST and/or DOE as required by contract. Coordinate/track vehicle maintenance with SST and vendors. Schedule/track preventative maintenance. Maintenance costs associated with the four (4) pool vehicles are included in this WBS; otherwise, vehicle maintenance is charged to the applicable subprojects. Coordinate/track vehicle accident data and verify property reporting. Assist procurement with leasing of vehicles. Provide input for the Quarterly KY State Fuel Tax report. Track equipment information including: custodian, location, fuel usage, fuel cost, mileage (if applicable), maintenance schedule, maintenance cost, etc. Coordinate/track equipment maintenance with SST and vendors. Schedule/track preventative maintenance. Assist procurement with leasing of equipment.

Human Resources

- Provide human resources support, which includes staffing reports required by DOE. Provide internal support to employees for benefits and various personnel issues. Process data of all new hires and temporary duty personnel throughout the contract. Provide an annual report of contractor expenditures for supplementary compensation, two reports of compensation, four reports of contractor employment, four reports of contractor employment distribution by program, and twelve manpower reports. Provide overall management and direction to the Contractor's Human Resource employees, interface with project organizations to assure consistency in supporting all HR areas, and interface with DOE to assure that overall objectives are met. Provide administration of all HR-related programs including HRIS, compensation planning and implementation, service awards and recognition, educational assistance, employee tracking, performance reviews and subcontractor transition. Provide for all new hire processing, internal/external job postings, requisition processing, terminations, transfers, and career employee counseling. Administration of HR-related investigations and lab testing for current Contractor

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<p>personnel and potential new hires. Implement all HR compliance programs including Diversity, EEO/AA, Employee Concerns, Employee Relations, Historical Black Colleges and Universities, and Disability Programs. Training of the Contractor's staff in all program areas and provides resources to support staff with concerns in these areas. Provide payroll and benefit accounting services to WFT subcontractors. Coordinate benefits for Grandfathered Workforce with BJC (minimal support). Negotiate with various Building Trades Unions for Davis-Bacon covered work. Administer labor agreements including the interpretation of various labor legislation and laws. Included also are grievance administration, arbitration, wage administration, Service Contract Act compliance, seniority/recall administration, Davis-Bacon certified payroll reconciliation, authenticate past practice issues, administration of Labor Standards Determination process, Workplace Substance Abuse Program administration and compliance monitoring, and administration of the Work Force Information System (WFIS) DOE Bargaining Calendar database.</p>		
<p><u>Legal</u></p> <ul style="list-style-type: none">• Provide litigation support and environmental laws and policy legal advice to management, and oversight and support of projects in areas of prime contract, procurement, subcontracts and binding corporate agreements; corporate policies and procedures; employment policies and practices; safety and health compliance, Price Anderson Act implementation and issues management; tax and intellectual property issues; government compliance and business ethics; companywide committees and initiatives; audits and corrective actions; and DOE defined reports, reviews and presentations. This task also includes Risk Management support to identify and control exposures to financial loss or injury from activities performed by the Contractor or its subcontractors and support to assure compliance with workers' compensation laws and administrative regulations. Manage litigation/adversary matters that may include legal actions related to contracts, employment issues, environmental laws, and workers' compensation claims, as required. Provide legal guidance for Freedom of Information Act, Privacy Act, and other information requests that are defined by law and directed by DOE. Provide value-added audit, assessment, and examination services. Investigate alleged waste, fraud, and abuse issues. Provide assistance for the Employees Ethics Helpline.		
<p><u>Information Technology Services</u></p> <ul style="list-style-type: none">• Provide coordination, scheduling, and tracking of information systems efforts by providing interface with SST for computer support including installation and relocation, repairs, upgrades, and field support. Assist in procurement and allocation of equipment to the contract; evaluation of software design and software creation services; and the supervision, planning, and oversight of Web development projects. Integrate programmatic data into systems applications. Interface with SST on-site network issues. Maintain all financial systems as well as address hardware and network issues with PCMP, OREIS, GIS, and PEMS with outside organizations providing those services. Support the internal data network interface with the Infrastructure contractor. Maintain the external network interface with database systems operated by UT Battelle in Oak Ridge. In the out-years (2010-2019), these services could continue to be purchased from UT Battelle; or a decision reached either to purchase commercial software or to develop an in-house database. Operate and maintain supplies for printers and fax machines. Provide system support of the financial system, Project Control Systems. Provide communication equipment and support as necessary for the Remediation contract project including these:<ul style="list-style-type: none">○ PCs, printers, and plotters○ Individual Telephone Unit Replacement○ Purchase of pagers and cell phones○ Radio units above the 175 units currently available plus repairs		

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<u>Public Affairs</u> <ul style="list-style-type: none">• Prepare presentations, documents, videos, and informational materials for client interaction with Citizens Advisory Board (CAB). Research and document requests from the CAB and provide support for official responses. Provide support to the monthly CAB and Task Force meetings. Provide support/lead for various site tours as requested by DOE and maintain/update site tour books. Plan media events and prepare press releases. Support efforts to encourage and facilitate public involvement, interest, and understanding of PPPO's Environmental Management Program and related issues by developing posters, briefings, videos, exhibits, and printed materials (e.g. fact sheets, pamphlets, brochures, bookmarks, informational electronic CDs). Provide support to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities, including coordination of community relations, advertisement of the availability of decision documents, and input to Proposed Plans, Responsiveness Summaries, Records of Decision, and Action Memoranda. Host seminars and training for DOE, local stakeholders, regulators, and the Contractor on informed consent principals, communications, and collaborative approaches to problem solving. Communicate the contract mission to the public. Develop and implement a strategy to comply with Executive Orders for Environmental Justice. Coordinate with Legal to assure compliance with FOIA and provide responses to inquiries under the Act.		
Project Integration and Controls <ul style="list-style-type: none">• Provide oversight and overall programmatic guidance for project controls activities including integration of estimates and schedules, development of project baselines, performance measurement, and project analysis. Support development of a risk management process to be used on all closure projects through the implementation of DOE Order 413.3. Develop and maintain the project controls programs and processes, including coordination and integration of the efforts of all other project controls organizations with outside groups. The project controls systems used include the Project Management Cost Processor (PMCP), Cost Engineering and Estimating System, and the Primavera Project Planner (P3™) scheduling software. Facilitate the development and maintenance of the Remediation Baseline, Remediation Life Cycle Baseline (LCB), and the Site LCB. Maintain the baselines through the Baseline Change Proposal (BCP) process. Prepare the Project Performance Report (PPR) to present to the PPPO and for their use in monthly reporting to DOE Headquarters. Issue and maintain Project Controls procedures, instructions, and guidance documents. Assure validity of cost estimates. Provide system engineering, development, maintenance, and implementation support to other Contractor organization and DOE in implementing integrated project control and planning processes and systems that support cost-effective planning and budget preparation, performance measures, and reporting. Activities include development of business processes and procedures as they relate to creation of software systems to support Project Controls; develop and design canned/custom reports for the users of the PMCP; provide site-level review of project data to ensure data quality and conformity across all projects and tasks, including coordination of internal project management self-assessments; and provide end-user support for system operations and data maintenance. Provide a central point of contact for all estimate validations, reviews, audits, etc., and develop programmatic oversight guidance and instructions on project integrated scheduling, including critical path. Respond to all budget calls including impact analyses of various budget scenarios and meetings with regulators, stakeholders and Congress on budget issues. Support the reporting activities through the DOE-HQ Integrated Planning, Accountability, and Budgeting System (IPABS); development and coordination of DOE-HQ performance measures (Gold Charts); and providing assistance for the preparation of QPRs, Mid-Year Reviews, Year-End Reviews, and other reviews as required.		

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Environment, Safety, Health, Quality and Training Provide management of the ESHQ&T staff to ensure that effective programs are in place and adequate resources are available to maintain compliance with all ESHQ&T laws, regulations, permits, and contractual requirements.		
<ul style="list-style-type: none">• <u>Emergency Management</u> Provide support to the Paducah Emergency Operations Center managed by USEC.• <u>Integrated Safety Management System</u> Develop, maintain, and implement a sitewide ISMS and Environmental Management System (EMS) in alignment with contractual requirements, other DOE direct contractor programs and DOE directives. Assure that safety is integrated successfully as a core value of all aspects of work planning and execution. Apply ISMS/EMS principles to all work, whether self-performed or subcontracted. Communicate and coordinate with other site tenants/residents (e.g., USEC, UDS, Infrastructure contractor) to assure a safe work environment. Maintain the ISMS/EMS Plans. Provide feedback and improvements through monthly performance metrics and semiannual trend analyses. Prepare ISMS/EMS bulletins to include some of the basic questions to be addressed in assessing implementation relative to the core ISMS/EMS functions. Participate in annual internal and DOE reviews to verify the acceptability of the ISMS/EMS activities. The DOE review will be conducted by a DOE-chartered ISMS/EMS verification team. ISMS implementation includes the review of DOE and PPPO directives and guidance and the impact of other site stakeholders implementing mechanisms. Providing guidance, flowdown to project plans and procedures, and training to new or changed requirements or procedures.• <u>Training</u> Provide employees training to enable them to perform their assigned duties and responsibilities and maintain training records to demonstrate that employees have fulfilled their training requirements. The training program is comprised of Company-wide ES&H training requirements; project specific training requirements; and DOE Order 5480.20, <i>Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities</i>. The ESHQ&T organization will coordinate the Contractor's Training Program, including establishing and implementing processes for the identification of training requirements, communicating requirements to employees, delivery of training, and management of training records. Also act as the interface with regulatory agencies and DOE on training matters and provide ready access for all employees to satisfy mandatory training requirements especially ESHQ&T functions.• <u>Occupational Safety and Industrial Hygiene</u> Maintain an effective worker protection program that complies with the requirements established by DOE Order 440.1A, <i>Worker Protection Management for DOE Federal and Contractor Employees</i>. Establish and maintain a written safety and health program that will incorporate the general requirements identified in Subpart B and specific program requirements from Subpart C of 10 CFR 851, <i>Worker Safety and Health Program</i>. Establish a structured approach to the worker safety and health program that will, at a minimum, include provisions for the following applicable functional areas: construction safety, fire protection, explosives safety, pressure safety, electrical safety, industrial hygiene, occupational medicine, biological safety, and motor vehicle safety. The structured approach must comply with the applicable standards and provisions in Appendix A of 10 CFR 851. Provide an integrated health and safety program for the Contractor's project to include all aspects of health and safety as required by federal, state, and local regulations; by DOE Orders and guidelines; and by Contractor's policies and health and safety procedures. Support requests related to industrial hygiene and employee health issues such as targeted health		

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<p>studies, FOIA requests, and the Exposed Employee study. Provide oversight of the Contractor's Occupational Medical Program and similar programs of projects and subcontractors. Provide and maintain regulatory and periodic reports of health and safety statistics, as required. Provide program support to the facility and field activities related to the remediation contract and will include, but not be limited to consultation; medical monitoring program; records management occupational exposure monitoring; ergonomics; accident and injury investigations; audits; inspections; required reports; regularly scheduled health and safety councils and meetings; accident and injury review boards; coordination with health and safety organizations within the federal, state, and local governments; review, revise, update, and maintain the Contractor's health and safety plan, site-specific health and safety plans, and site-specific field activity safety documents; and coordinate with other project participants to ensure full integration of project health and safety initiatives. Provide a respiratory protection program including respirator fit testing and medical monitoring to ensure fitness to work. Conduct injury and accident investigations to ensure root cause is determined and corrected. Provide lessons learned to all site contractors and the Contractor's employees and subcontractors. Implement a beryllium protection program consistent with 10 CFR 850. BJC/PAD-581 will be used as the basis to develop a beryllium protection program. Ensure adequate access to health programs/ambulatory care, and Beryllium and radiation worker health surveillance programs to support current site workers who are or may be exposed to radiological and hazardous materials. Provide investigations and support for ES&H issues/effects resulting from the historical "work for others program." Provide support to DOE and participate in the site's Emergency Management program by providing adequate staff to support the Emergency Operations Center (EOC), which is managed by USEC, for the Contractor's operations; and ensure adequate support is available to respond to emergencies. Comply with the site's fire protection program. Fire protection function supplied by USEC. Provide non emergency spill cleanup and other post-emergency response activities. Maintain emergency response capability for all Remediation contractor activities, in coordination with the EOC.</p> <p>• <u>Radiological Controls (RADCON)</u> Implement the Contractor's RPP and the RADCON program in accordance with 10 CFR 835 "Occupational Radiological Protection" and DOE Order 5400.5 "Radiation Protection of the Public and the Environment." This includes RPP elements such as the ALARA program, internal and external dosimetry programs, worker and area monitoring programs, entry control program, radiation safety training program, radioactive source control program, release of materials, instrument calibration and maintenance, and radiological records management and reporting program. Implement a Radiation Control Program to support remediation objectives. Develop a set of command media for program implementation including the requirements provided above and other applicable requirements found in guidance documents and consensus standards from DOE; NRC; EPA; Commonwealth of Kentucky; American National Standards Institute Standards; American Nuclear Society; National Council on Radiation Protection and Measurements; International Commission on Radiation Protection; International Atomic Energy Agency; and other nationally and internationally recognized organizations. Design, develop, evaluate, and maintain radiological survey and analytical detection systems; counting techniques and instruments; radiological survey and measurement methodologies; and data interpretation guidance that comply with applicable federal requirements and consensus standards. Develop and implement the Contractor's Radiological Control Technician (RCT) and Radiological Worker program to ensure compliance with 10 CFR 835. Maintain (as appropriate) radioanalytical and RCT measurement data acquired during site investigations. Perform overall program coordination and integration; provide a subject matter expert for the ISMS program, ALARA Program, and the auditing and surveillance of subcontracted radioanalytical laboratories. Provide a DOELAP</p>		

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<p>certified radiation dosimetry program which includes dosimeters, supplies, bioassay analysis, and reporting as required by 10 CFR 835 for the Contractor's employees, and subcontractors.</p> <ul style="list-style-type: none">• <u>Quality Assurance</u> Manage the QA Program in compliance with 10 CFR 830 Subpart A, "Quality Assurance Requirements" and all applicable DOE Orders and regulations. This includes a QA Program which addresses these areas:<ul style="list-style-type: none">○ Management○ Personnel Training and Qualifications○ Operations○ Data○ Quality Improvement○ Documents and Records○ Work Processes○ Design○ Procurement○ Inspection and Acceptance Testing○ Management Assessments○ Independent Assessments <p>Conduct readiness reviews or assessments of startup or restart activities at category 1, 2, or 3 nuclear facilities. DOE Standard 1027-92 is used to determine the nuclear facility category and DOE Standard 3006-2000 is used to implement readiness requirements. Provide a liaison with DNFSB to ensure conformance with Board requirements and provide coordination among the Contractor, DNFSB, DOE, and other appropriate groups. Oversee the Price Anderson Amendment Act process that identifies, evaluates, reports, and tracks all issues, events, or occurrences involving potential violation of 10 CFR 830 Subpart A, QA requirements, and 10 CFR 835 <i>Occupational Radiation Protection</i> requirements. This task is responsible for chairing the Contractor's Senior Review Board to ensure consistency in evaluation and reporting of potential PAAA noncompliances. Provide an integrated program that supports the implementation of an Issues Management Program and its associated elements (e.g., corrective action tracking, occurrence reporting, PAAA reporting, root cause analysis, and lessons learned). Provide support to the projects in maintaining the corrective action tracking system and generation of periodic status reports for both the Contractor's PMs and DOE. Provide a program for the development, review, approval, and distribution of procedures to communicate requirements and expectations to those performing work through a system that assures proper control of the work. This activity consists of three components: standards management, procedures/directives management, and SMEs. The QA group provides independent surveillances/assessments of functional and project organizational elements of the Contractor and their subcontractors to determine compliance and performance with contractual, DOE, the Contractor, PAAA, and other technical requirements. Deficiencies resulting from the independent assessments are entered into the Contractor's Issues Management Program for tracking and trending. Monitor and report on all Contractor self-assessment activities. Annually provide input on the status of ES&H conditions in the nonleased areas of the Paducah site to the DOE Office of Nuclear Energy for inclusion in their annual report. Similarly, provide input to DOE to support various reports to Congress, DOE HQ, the public, and other requesting organizations. Provide a comprehensive PAAA Program including development of procedures and training materials to describe the overall process and criteria, assist in the establishment and maintenance of an integrated PAAA assessment system; evaluate management systems; establish and maintain a PAAA electronic reporting and corrective action identification and tracking system; assist in the development of RADCON procedures; plans and training/certification processes; assist PMs with the planning of project activities for Radiological</p>		

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<p>areas governed by PAAA criteria; provide assistance and consultation to management for measurement and interpretation of PAAA indicators; investigate noncompliances that have the potential for violating 10 CFR 830 and/or 10 CFR 835 rule space. Address contractual and regulatory requirements to assure consistent implementation of PAAA requirements. Review and revise documents periodically as required to reflect QA Rule implementation criteria. Identify areas for assessments as a result of their importance, risk, and complexities for application of PAAA criteria.</p> <p>• Environmental Compliance and Regulatory Affairs Office Provide regulatory oversight and guidance for both programmatic and project activities to ensure compliance with environmental laws and regulations, permits, and compliance agreements; including, Federal Facility Agreement (FFA) under Section 120(e) of CERCLA; Kentucky Hazardous Waste Permit (RCRA); Hazardous and Solid Waste Amendments (HSWA) Permit; Kentucky Pollutant Discharge Elimination System (KPDES) Permit; October 2003 Agreed Order; DUF6 Agreed Order; Site Treatment Plan; Toxic Substances Control Act (TSCA) Federal Facility Compliance Agreement (FFCA); C-746-U Leachate Agreed Order; and, Solid Waste Permit. Support strategic planning including annual preparation of the FFA Site Management Plan (SMP), End State Vision Document, and review and input. Review decision documents to ensure they are consistent/compliant with the FFA and overall strategy. Track and maintain a controlled copy of regulatory commitments and enforceable milestones. Provide legal review and advice for enforceable compliance issues. Support Regulatory reporting and provide interface and liaison with DOE and regulatory agencies to ensure consistent communication and application of requirements. Oversee the development of regulatory documents necessary to ensure compliance with applicable regulations, permits, and orders (e.g., closure plans, permit modifications, and permit renewals). Provide direction for the preparation of CERCLA applicable or relevant and appropriate requirements for decision documents, including coordination of Long-Term Stewardship (LTS) activities to assure that LTS issues are considered in the cleanup decision making processes and take into account stakeholder and regulator concerns. Provide maintenance of Remedial Action Information Management System (RAIMS Light) database for Paducah and tracking of release sites for reporting through the FFA and DOE HQ performance measures (Gold Chart). Provide support to DOE for the Paducah FFA. This includes support to FFA Project Managers meetings, tracking of FFA changes and milestones, plus maintenance of annotated outlines for FFA documents. Another function of this task is to maintain the HSWA permit and SWMU reporting requirements. Provide the management, planning, and review of overall regulatory support tasks and cross-project products. Maintain staff communication and direction in the form of routine and impromptu staff meetings, memoranda, etc.; ensure the integration of work task and activities; establish and maintain a consistent policy and approach to regulatory support efforts; identify and evaluate regulatory requirements the program must satisfy in order to provide adequate support; define a strategic plan, technical objectives, and related cost and schedule considerations; manage activity monitoring, performance measurement, and performance trending; coordinate interorganization interfaces; and participate on multifunctional teams. Identify and maintain a current list of federal and state agencies responsible for ensuring compliance with applicable environmental laws and regulations; develop, document, and implement a process by which changes to existing laws, regulations, Executive Orders (EOs), and DOE Orders are monitored and evaluated for potential applicability and impacts to Paducah remediation activities; develop and implement action plans designed to achieve and maintain compliance with applicable environmental regulatory requirements, permit stipulations, and conditions; maintain general correspondence, reporting, and records management. Implement an Underground Storage Tank program consistent with all Kentucky regulations. Perform an environmental compliance due diligence review within 30 days after the end of the contract</p>		

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<p>transition period. Direct consultants and temporary staff for due diligence review. Revise Part A of the RCRA Hazardous Waste Permit annually. Revise Part B of the RCRA Hazardous Waste Permit, as required. Provide legal advice in environmental compliance strategies and implementation.</p>		
<ul style="list-style-type: none">• Work Controls, Engineering and Facilities Office <u>Document Control</u> Provide the management, creation, desktop publishing, technical writing, editing, graphics, proofreading, reproduction, and electronic archival of documents that support contract activities. Provide management of a comprehensive and compliant records management and document control system to support current activities as well as legacy records, including creation/receipt, identification/classification, distribution, tracking, indexing, turnover, interim storage/preservation, retrieval, scheduling, and disposition of these records. Provide guidance and training to record generator; support for performing assessments to determine compliance with procedures. Work with the project staff to ensure early identification of records and timely inclusion in the document control system. Track each step in the creation of performance documents and develop historical files for all performance documents. Receive, log, copy, and distribute incoming mail. Maintain the forms program, including the creation of templates, guidelines, policies, and procedures to ensure tags, Web-based forms, and paper forms adhere to established criteria. Maintain control of all documents, plans, policies, or procedures created, incoming or outgoing, for the Contractor according to established requirements. This will be achieved by maintaining a master reference list; updating documents as necessary, continuing to implement electronic tracking systems, and protecting & distributing controlled documents. Provide and control document numbers according to established procedures. Operation of the Contractor's Document Control Center includes the following:<ul style="list-style-type: none">○ Oversee record submission and retrieval. Provide current and historical searches of records.○ Establish and maintain the Contractor's archival system; ensure security/integrity of records; and be responsible for stewardship of historical environmental data as delivered by incumbent contractor.○ Create and maintain the Contractor's Reading Room. Provide a secure repository and archival, tracking, and retrieval services for documents and historical records. These documents and records pertain to the Paducah environmental cleanup activities.○ The Contractor's Technical Information Center will provide the level of effort support required to provide a secure repository; to archive, track, and retrieve documents and historical records; to provide research services; to scan records; and to distribute controlled documents. This will be achieved by following established procedures for protecting documents and records, providing on-line reference services, maintaining master reference list, updating federal and local regulatory references, continuing to implement electronic tracking systems, and protecting and distributing controlled documents.○ Maintain the web-based procedures and policy site.		
<u>Engineering</u> Provide engineering support for all Contractor subprojects. Responsibilities include, but are not limited to, maintaining a consistent engineering approach, approval of all engineering activities and designs, design and archived drawing management, the development and maintenance of engineering procedures, release of QA – holds with use-as-is design, the hoisting and rigging program, the excavation/penetration program, the coordination of fire protection engineering services (including fire hazard analyses) in accordance with DOE Order 420.1B, and site surveying services. USEC is responsible for fire prevention and associated safety programs and procedures.		

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Nuclear Safety
Coordinate the Safety Basis Documentation Program and maintain it in accordance with 10 CFR 830 Subpart B, for all nonleased DOE facilities, including but not limited to, C-410/420, DMSAs, and C-746-Q. Ensure the update of the safety basis to keep it current and to reflect changes in the facility, the work, and hazards as they are analyzed in the DSA; annually submit to DOE either the updated documented safety analysis for approval or a letter stating that there have been no changes since the prior submittal. Provide technical expertise for the preparation and implementation of DSAs and DSA Implementation Plans. Coordinate the NCS program and maintain it in accordance with DOE Order 420.1B, CRD, and facility safety for the Paducah site. Ensure a NCS program that applies to fissionable materials that are produced, processed, stored, transferred, disposed, or otherwise handled is maintained and updated per DOE Order 420.1B.

The method used for determining earned value for this WBS element is Level of Effort.

DELIVERABLES

Business Administration

- Compensation Plan (Salary Plan) – Annually by 3/1 for coming calendar year (CY)
- Application for Contractor Compensation Approval for five most highly compensated employees – annually by 2/1
- Monthly Head Count – monthly as required by Environmental Management Consolidated Business Center (EMCBC)
- Report of Contractor Expenditures for Employee Supplementary Compensation – annually 3/1
- Contractor Salary-Wage Increase Expenditure – 30 days after program year
- Collective Bargaining Agreements – as soon as possible after conclusion of negotiation
- Report of Settlement – 30 days after contract settlement
- Head Count for end of Current Fiscal Year and Projected Head Count for Upcoming Fiscal Year – as required by EMCBC
- Projected Layoffs for Current Fiscal and Future Fiscal Years – as requested by EMCBC
- Work Force Restructuring Plan – as required
- Substance Abuse Program Results and Reports for Lower Tier Subcontractors – semiannually, 1/1 and 7/30
- Employee Assistance Program Services Reports – as required
- Employment Reports for Disabled Veterans and Veterans of the Vietnam Era – annually by 9/30
- Equal Opportunity SF100 – annually by 9/30
- Affirmative Action Compliance Program – Females and Minorities – annual update by 1/31
- Affirmative Action Compliance Program – Veterans and Individuals with Disabilities – annual update by 7/1
- DOE Annual Estimated Property Valuation – annually by 1/31
- Annual Summary of Fire Damage – annually by 1/31 for the previous calendar year
- Annual Compensation Increase Plan – annually at the beginning of the program year
- Financial Plan Requests – monthly by 15th
- Monthly Commitment Reports/Monthly Accruals – monthly by 10th working day
- Submission of Invoices – bi-weekly
- Fee Invoices – quarterly
- Annual Maintenance Report for Required, Actual, and Deferred Costs – annually by 11/30
- Annual Review of Utilization of Real Property (Provide input to others to prepare report) – annually by November 1st

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<ul style="list-style-type: none">• Site Usage Calculation (Provide input to others to prepare report) – annually by November 1st• Annual Real and Personal Property Inventory Report (Provide input to others to prepare report) – annually by November 30th• Site Disposition Plan (Provide input to others to prepare report)• Government Property Missing, Lost, and Damaged or Theft Report – Monthly e-mail by 5th• Property, Plant, and Equipment (Provide input to others to prepare report) – annually by November 1st• Surveillance and Maintenance Inspection Summary – quarterly by the 15th• Budget Call Inputs (in conjunction with Project Controls) – annually as requested• Issue/Receive and Record Interoffice Work Orders – monthly by the 20th calendar day• Statement of Costs Incurred and Claimed – annually by 6/30• Quarterly Erroneous Payment Reports• Reporting associated with DOE Orders regarding Inspector General and General Accounting Office activities – as required• Intergovernment Payment and Collection (IPAC) flatfile – monthly by 20th calendar day as, appropriate• Audited Financial Statement – as required• Transportation Bills - quarterly• Federal Managers Financial Integrity Act Report – as required• Travel Cost Summary – quarterly• Employer’s Accounting for Post-retirement Benefits Other Than Pensions – annually – special request• Employer’s Accounting for Pensions – annually – special request• Environmental Liabilities – annually and quarterly – special request• ES&H Liabilities – annually – special request• Deferred Maintenance – annually – special request• Conference Management Report – as required• Uncosted Balance Report• Mandatory Obligation Report – annually – special request• Cash Collections – as required• Actuarial Valuation Reports – annually by 9/30 following the plan year• IRS Form 5500 with schedules – Within one year of plan year end• Plan Experience Reports for Liability Insurance –as requested by EMCBC• IRS Form 5300 – as required• Contract Closeout Plan – as requested• Management Representation and Certification – annually – special request• Standard Form 98-“Notice of Intention to Make a Service Contract and Response to Notice” – as required• Tabulation of Work Hours and Vehicle Usage – quarterly (April, July, October, and January)• Computer Security Incident Reports – per occurrence• Cyber Security Program Plan (CSPP) – 2010, every 2 years thereafter• CSPP Self Assessment – annually by 11/30• PSEC Plan; Local Threat Assessment/Statement/OPSEC CSIL/EEFI lists (Provide input to others to prepare report) - annually		
Project Integration and Controls <ul style="list-style-type: none">• Project Execution Plan – updates as required• Support for Preparation of Triennial Report to Congress – D&D fund – special request		

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<ul style="list-style-type: none">• Remediation Baseline and Remediation LCB – updates as required• Site LCB – update as directed• Risk Management Plan – semiannually• PBS Budget Allocation Plan – annually in September• Project Performance Report (PPR) – monthly• Semiannual Critical Analysis Report (SACAR)• Baseline Change Proposal (BCP) Log – monthly• Gold Chart Performance Metrics – monthly• Budget Calls Input – annually as requested• Comprehensive Commitment Tracking Report - monthly		
ESHQ&T <ul style="list-style-type: none">• Work Smart Standards – updated annually• Performance Metrics• Trend Analysis• ISMS Bulletins• Annual Radiological Exposure Data Reporting – annually by March 31st• Occupational Radiation Exposure Reports to Individuals – annually by March 31st• Provide input to the Annual Report to Congress• Site Emergency Plan (Integrated with USEC per contract clause)• Individual Accident/Incident & Injury/Illness Report (DOE Form 5484.3) – quarterly 4/25, 7/25, 10/25, 1/25• Report of Work-Related Damage or Loss of Property & Vehicles Due to Accidents– annually 5/1• Excess Injuries and Illness Report – quarterly• Reporting Subcontractor Accident Information (F 5484.3 and 5484.4) – per event• Performance Indicator Data for Epidemiological Analyses-OSH Studies – quarterly• Occurrence Reporting and Processing System Reports – per occurrence• Employee Concern Program Status Report – quarterly• Quality Assurance Plan – annual updates• Occupational Safety & Health Administration (OSHA) 300 Log Summary		
Environmental Compliance and Regulatory Affairs Office <ul style="list-style-type: none">• FFA Modifications – As required• Part A of the Hazardous Waste Facility Permit revisions - annually by 1/1• Part B of the Hazardous Waste Facility Permit revisions - as necessary• C-746-U Solid Waste Disposal Facility Permit renewal application• Kentucky Pollution Discharge Elimination System (KPDES) permit renewal application• Regulatory Commitment Tracking Report – Provided to DOE via e-mail each Friday• FFA SMP – annually by 11/15• End State Vision Document – annually by December• Environmental Compliance Certification – annually by 5/24		
Work Controls, Engineering and Facilities Office <ul style="list-style-type: none">• Records (paper and electronic) to the Infrastructure Contractor for storage in the centralize records repository• Documents to the Paducah Environmental Information Center• Energy Management Plan (Provide input to others to prepare report) – updated annually• Maintenance Implementation Plan		

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- Energy Consumption Reports (Provide input to others to prepare report)
- FOCI Self-Assessment Certification – annually
- USQs
- TSR Modifications
- SARs

REQUIREMENTS

- CERCLA/National Contingency Plan
- KY Hazardous Waste Permit (KY8-890-008-982)
- FFA for the Paducah Gaseous Diffusion Plant (PGDP)
- SMP for PGDP (annual revisions)
- Applicable state and federal laws and regulations [applicable or relevant and appropriate requirements (ARARS)]
- Contractor ISMS
- UEO-1066, as updated – Lease Agreement with DOE and USEC, Revision 4 dated October 30, 2001
- Enclosure to GDP 95-0018, as updated – United States Enrichment Corporation and DOE Resolution of Shared Site Issues, Revision 1 dated March 30, 1998
- Applicable Contractor plans, policies and procedures
- Applicable DOE Orders
- Applicable Federal Acquisition Regulations (FAR)

It is the core value of the Contractor that the safety and health of every worker, the public at large, and our environment are the most important assets that we are entrusted to protect. To accomplish this, an ISMS, based on DOE's ISMS, has been implemented that incorporates the five core functions and is based on the seven guiding principles. The objective of ISMS is to systematically integrate safety and environmental protection into the planning and execution of all work activities. The term safety encompasses Nuclear Safety, Industrial Safety, Industrial Hygiene, Occupational Health, Health Physics, and environmental issues. ISMS requirements flow-down to the Contractor's subcontractors. The five core functions are (1) define the scope of work, (2) analyze hazards, (3) develop and implement hazard controls, (4) perform work within controls, and (5) provide feedback and continuous improvement. The seven guiding principles are (1) line management responsibility for safety, (2) clear roles and responsibilities, (3) competence commensurate with responsibility, (4) balanced priorities, (5) identification of safety standards and requirements, (6) hazard control tailored to work being performed, and (7) operations authorization.

Before a subproject begins, several activities must be completed that demonstrate that all involved in the project have completed rigorous health and safety reviews and that all potential hazards of doing the work have been identified. The routine activities in remedial actions are conducted in accordance with standard operating procedures, activity hazard analyses, and Integrated Safety Management plans. Nonroutine work will require a readiness assessment, as necessary, to ensure complete health, safety, and environmental reviews prior to work start. This assessment is conducted by people experienced in similar kinds of work with the right to examine all aspects of a project about to commence and requires that the project team provide documented evidence that any applicable requirements of the job have been met.

SCOPE ASSUMPTIONS

- The ISMS/EMS program could be subject to an annual verification review by a DOE chartered

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<p>ISMS verification team. Although annual verification is not a given, the Contractor ESH&QT assumes the outcome of the review to be successful. Any unforeseen corrective actions will be addressed and corrected to DOE's satisfaction should they develop.</p> <ul style="list-style-type: none">• Training cost for site tenants borne by own organization.• Costs for field ES&H personnel are included in the WBS element for which support is required (ER, WM or D&D).• The grandfather employee benefit programs will be administered by BJC in Oak Ridge with the Contractor providing benefit interface to the employee.• SST will provide for storage and management of records as delivered.• The Paducah Environmental Information Center is operated by others.• No new facilities will be added to the lists of covered property.• Administration of the real and personal property program is the responsibility of the SST including managing an automated database of all personal property actions related to acquisition, use, and disposition.• SST also conducts property inventories, disposition operations, and provides input to the Facility Information Management System for real property.• SST will be responsible for PC unpack, set-up, installation, software installation, PC take-down and repair, and all network administration and help desk support at Paducah.• Communications equipment transmission line (T-1) provided to the Contractor as GFS&I is of an adequate type, size, and amount to support the Contractor's remediation offices at Paducah.• Installation of any additional Contractor PC ports, including interconnecting wiring between new space and existing DOE tie-in points will be provided by SST.• Utility costs for the facilities located in the Ballard County Industrial Park are provided by USEC and SST.		
<u>COMPLETION CRITERIA</u>		
<ul style="list-style-type: none">• Since the subproject is LOE, successful completion of the contract scope includes the timely preparation and submittal of contract deliverables, as outlined in Section J, and regulatory deliverables, to DOE; the comments from DOE, are to be resolved to the satisfaction of DOE.• The implementation of ISMS, will be measured by the development and maintenance of the site-wide program, along with the Environmental Management System (EMS) in alignment with contractual requirements, other DOE direct contractor programs and DOE directives. The Contractor's management & DOE will be assured that safety was integrated successfully as a core value of all aspects of work planning and execution. ISMS/EMS principles were applied to all work, whether self-performed or subcontracted. Communication and coordination with other site tenants/ residents (e.g., USEC, UDS, and Infrastructure contractor) assured a safe work environment. ISMS/EMS Plans were maintained properly. Feedback and improvements were provided through monthly performance metrics and semiannual trend analyses. ISMS/EMS bulletins were prepared in a timely fashion to include some of the basic questions to be addressed in assessing implementation relative to the core ISMS/EMS functions. Participation in annual internal and DOE reviews verified the acceptability of the ISMS/EMS activities.• The implementation of QA standards as measured by compliance with 10 CFR 830 Subpart A, "Quality Assurance Requirements."• The Contractor's Contract scope was completed at cost and in time to support completion of the Paducah Site LCB by 2019.		
<u>RISK MANAGEMENT</u>		
See Risk Management Plan for analysis (if applicable).		

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Risk was mitigated through the following efforts:

- Maintaining a robust, up-to-date, cyber security program to mitigate the risk of data being compromised by outside entities.
- Maintaining a robust NCS program to help avoid a nuclear criticality accident.
- Preventing the loss of high risk items through a comprehensive defense-in-depth security awareness program, facility controls, refresher training, and observation.
- Using established procedures and experienced personnel to maintain the records management and document control functions.
- Providing cell phones for emergency needs to avoid possible loss of communications using portable radios in areas on or off-site that have not required previous communication coverage.

CERCLA AREAS AND SWMU

N/A

BASIS OF ESTIMATE

1. Summary of Site Conditions

- The subproject is largely management-based; therefore, it encompasses the conditions of the Kevil facilities and the areas that are owned by DOE within the USEC facility. Although no specific clearance level is required for access to the Kevil facility; personnel are required to possess a DOE clearance that is essential to perform their job function and, where applicable, satisfy a legitimate "need to know!"

2. Estimating Methods

☐ Parametric ☒ Bottoms-Up ☐ Other: _____

3. Sources of Estimating

- Labor effort was developed based on previous experience at the NTS performing similar activities and a review of the existing site program.
- Escalation is 2.4% per year.
- Non-labor cost were developed using JTR and vendor quotes.
- Cost estimates for continuing education are based on the training anticipated to maintain required professional skills in the specific area and reflect a sampling of course fees and conferences in professional disciplines.
- Activity requirements are based on a review of the SOW, referenced documents, the Paducah FFA/SMP, the Agreed Order, available RCRA permits, DOE Orders, and the Code of Federal Regulations.
- Cost of new computers, printers, and plotters is based on vendor quotes.
- Cost of cell phone and pagers is based on vendor quotes.
- There is no contingency in the estimate.

4. Basis of Estimate (Un-escalated values)

- The Basis of Estimate was developed for the total cost of the Out-year Project Support Service Center and be will allocated across three WBS elements (04.11.99.03, 04.12.99.03, and 04.13.99.03). Below is the percentage that will be allocated to this WBS.
- The Baseline and actual cost in this WBS will be allocated based on their respective percentage of the total Contractor BCWS per fiscal year as summarized below:

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PBS	2010	2011	2012	2013	2014
PA-0011	3.43%	3.64%	3.27%	2.62%	2.00%

PBS	2015	2016	2017	2018	2019
PA-0011	1.42%	1.18%	1.29%	2.19%	9.97%

The Out-year estimate is based on the PRS Baseline estimate.

WASTE VOLUMES

N/A

PROJECT SCHEDULE

See attached schedule.

BASELINE BY YEAR

See attached Baseline by Year Report.